

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ALLISON HETRICK, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ASCEND LEARNING, LLC,

Defendant.

Civil Action No. 1:25-cv-10103-NMG

DEFENDANT'S MOTION TO STAY DISCOVERY

Defendant Ascend Learning, LLC respectfully requests that this Honorable Court order a limited stay of discovery pending the Court's ruling on the Defendant's Motion to Dismiss Plaintiff Allison Hetrick's First Amended Class Action Complaint. (*See* Dkt. 28.)

This request is based on good cause, as detailed in the accompanying Memorandum of Law. Ascend has a pending motion before the Court that is dispositive of all claims against it; for the parties to engage in exchanging and responding to discovery requests would result in annoyance, undue burden, and costly and unnecessary expenses.

WHEREFORE, Ascend respectfully requests that this Honorable Court stay all discovery in this matter pending the Court's ruling on Ascend's Motion to Dismiss and for such other relief this Court deems just and proper.

Dated: September 5, 2025

/s/ Jennifer L. Chunias

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Ascend Learning, LLC

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

I, Jennifer L. Chunias, counsel for the Defendant in the above-captioned action, hereby certify that on September 3, 2025, counsel for the Defendant conferred with counsel for the Plaintiff before filing this motion. Counsel for Plaintiff stated that he did not agree to a stay of discovery.

/s/ Jennifer L. Chunias

Jennifer L. Chunias

CERTIFICATE OF SERVICE

I, Jennifer L. Chunias, hereby certify that a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on September 5, 2025.

/s/ Jennifer L. Chunias

Jennifer L. Chunias